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Attorney for Defendant
GLORIA RAMOS MONTEJANO

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(Oakland Venue)

UNITED STATES OF AMERICA,)	CR 09-00866-DLJ
)	
Plaintiff,)	STIPULATION AND
)	ORDER TO
vs.)	CONTINUE HEARING
)	
GLORIA RAMOS-MONTEJANO,)	
)	Date: November 13, 2009
Defendant .)	Time: 9:00 a.m.
)	Judge: Hon. D. Lowell Jensen

Defendant Gloria Ramos-Montejano is currently set to appear before this Court on November 13, 2009 for a change of plea. The parties jointly request that this matter be continued to Friday, November 20, 2009, at 9:00 a.m., for the following reasons:

1. The parties require additional time to complete the plea agreement; and
2. Defendant requires additional time to prepare with her counsel for the safety valve proffer, and for the government to evaluate whether or not the requirements of U.S.S.G. §5C1.2 have been satisfied.

The parties stipulate that the time between November 13, 2009 and November 20, 2009 should be excluded from the calculation of time under the Speedy Trial Act. The parties stipulate that the ends of justice are served by the Court excluding such

1 time, so that counsel for the defendant may have reasonable time necessary for
2 effective preparation, taking into account the exercise of due diligence. 18 U.S.C. §
3 3161(h)(7)(B)(iv).

4 Therefore, defendant and the United States hereby agree and stipulate that the
5 hearing currently set for November 13, 2009 shall be continued to Friday, November
6 20, 2009, at 9:00 a.m.

7 IT IS SO STIPULATED.

8 Respectfully submitted,

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10 DATED: November 11, 2009

11 /S/ Suzanne A. Luban
12 SUZANNE A. LUBAN
Attorney for Ms. Ramos-Montejano

13 DATED: November 11, 2009

14 /S/ Wade Rhyne¹
15 WADE RHYNE
Assistant United States Attorney
Counsel for Plaintiff

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26 ¹I hereby attest that I have on file all holograph signatures for any signatures
indicated by a "conformed" signature (/S/) within this efiled document.

27 /S/ Suzanne A. Luban
28 SUZANNE A. LUBAN
Counsel for Defendant

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(Oakland Venue)

UNITED STATES OF AMERICA,)	CR 09 -00866-DLJ
Plaintiff,)	
vs.)	ORDER
GLORIA RAMOS-MONTEJANO,)	
Defendant.)	

For Good Cause Shown, IT IS HEREBY ORDERED that the hearing currently set for November 13, 2009 shall be continued to Friday, November 20, 2009, at 9:00 a.m. and the time between November 13, 2009 and November 20, 2009 should be excluded from the calculation of time under the Speedy Trial Act. The court finds that the ends of justice are served by the Court excluding such time, so that counsel for the defendant may have reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

DATED: November 12, 2009



HON. D. LOWELL JENSEN
U.S. District Court